

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:)	Bankruptcy No. 20-10334-TPA
)	Chapter 11
JOSEPH MARTIN THOMAS,)	
Debtor)	Related to Doc. Nos. 291 and 350
)	
WELLS FARGO NATIONAL)	
ASSOCIATION,)	
Movant,)	
)	
vs.)	
)	Date and Time of Hearing:
TRI-STATE PAIN INSTITUTE, LLC,)	April 28, 2021 at 11 a.m.
JOSEPH MARTIN THOMAS, and 2374)	
VILLAGE COMMON DRIVE, LLC,)	Response deadline:
Respondents)	April 2, 2021

**JOINDER IN DEBTOR'S RESPONSE AND OBJECTION TO
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, comes the Official Creditors' Committee ("Committee") for Tri-State Pain Institute, LLC ("Tri-State"), an affiliate of the Debtor in a separate, but related proceeding for reorganization under Chapter 11 at Case No. 20-10049-TPA, by and through the Committee's counsel, Knox McLaughlin Gornall & Sennett, P.C., with this Joinder in Debtor's Response to the forgoing Motion for Relief from Automatic Stay, as follows.

1. Wells Fargo National Association filed an *Expedited Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. § 362 or Alternatively Dismissal or Conversion of Case or Appointment of Chapter 11 Trustee* (the "Motion") at Doc No. 291.

2. The Debtor filed its Response to the Motion (the "Debtor's Response") at Doc No. 350.

3. The Committee joins in the Debtor's Response and objects to the Motion for Relief from Stay.

4. Counsel for the Committee continues to work with counsel for Wells Fargo and counsel for the Debtor on the pending sale of 2374 Village Common Drive. The bidding procedures were approved on March 26, 2021 at Doc. 339 and the undersigned believes that there will be other qualified bidders at the sale hearing.

WHEREFORE, the Committee requests that this Court enter an Order denying Wells Fargo's Motion for Relief from the Automatic Stay, together with any additional relief deemed necessary.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.
Attorneys for the Official Committee of Unsecured
Creditors for Tri-State Pain Institute, LLC

By: /s/ Guy C. Fustine
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 2, 2021, a copy of the Committee's Joinder in Debtor's Response and Objection to the forgoing Motion for Relief from Automatic Stay was served by first class, United States mail, postage pre-paid, and/or electronic service, as follows:

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.
Attorneys for the Official Committee of Unsecured
Creditors for Tri-State Pain Institute, LLC

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